

## **HBF Statements St Albans Local Plan EIP**

### **Matter 3 – The Green Belt**

#### **Issue 1 – Principle of Green Belt Release**

Paragraph 146 of the Framework states that, before concluding that exceptional circumstances exist to justify changes to the Green Belt, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting housing need. This includes making as much use as possible of suitable brownfield sites and underutilised land, optimising the density of development and liaising with neighbouring authorities to determine whether they could accommodate some of the identified need for development.

Q1 Has the Council examined fully all other reasonable options for meeting housing needs as required by the Framework?

HBF would agree that there are insufficient brownfield sites, even when densities are optimised, in order for the Council to meet its housing needs in full and that no other local planning authority is willing or able to help meet some of SADC's housing needs in their areas. The Council are therefore correct in undertaking a green belt review and considering whether exceptional circumstances exist to justify changes to the green belt in order to meet its development needs.

Paragraph 147 of the Framework then states that when reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Where it has been concluded that Green Belt alterations are necessary, "...plans should give first consideration to land which has been previously developed and/or is well served by public transport."

Q2 In response to the Inspectors' Initial Questions, the Council refers to the application of buffers around settlements to help determine which sites to allocate. Is this approach justified, effective and consistent with national planning policy?

HBF have concerns over the use of buffer zone of either 250m or 400m. The Council's justification is that sites beyond these zones are inherently unsustainable and that they would create holes in the green belt which would have a harmful effect on its integrity. With regard to sites beyond the buffer zone being unsustainable HBF would suggest that either of these distances is within an easy walking distance of a settlement and fails to recognise the potential for public transport to further ensure the connectivity between new development and any adjacent settlement. To exclude such sites before even considering their suitability alongside other sites is unjustified and premature. As for the

creation of holes, again it would appear to be premature to factor in such considerations without considering whether a submitted site outside of the buffer zone would actually impact on the integrity of the Green Belt. Discounting sites on the basis they are unsustainable or impact on the integrity of the Green Belt is reasonable but to do so arbitrarily using a buffer zone to discount sites before a more detailed site assessment is not considered to be an effective approach.

Q3 Having determined, at a strategic level, that alterations to the Green Belt boundary would be necessary, how did the Council determine the location of Green Belt releases? How does this correlate to the settlement hierarchy and spatial strategy?

For Council.

Q4 In deciding to review the Green Belt boundary, how did the Council consider the provision of safeguarded land? Is the Plan consistent with paragraph 148 c) of the Framework, which sets out that, where necessary, areas of safeguarded land between the urban area and the Green Belt should be identified to meet longer-term development needs?

For Council.

### **Issue 3 – Exceptional Circumstances**

Q1 Do exceptional circumstances exist to alter the Green Belt boundary in St Albans and has this been fully evidenced and justified as part of the plan-making process?

Yes. The Council outline in paragraph 7.2 of GB 01.01 the context for considering whether there are exceptional circumstances and the factors that have been weighed in that decision. HBF would agree that the exceptional circumstances exist with the council facing an acute shortfall in housing supply against identified needs with no other means of substantially boosting housing supply other than through amending green belt boundaries. The level of under supply has been significant. Table 2 of the AMR 2023 housing delivery in the past ten years has averaged 410 dpa, significantly below identified housing needs over that period which ranged from 586 in the 2013 SHMA to the 885 dpa required by the current standard method. This lack of supply has contributed to significant affordability issues within St Albans. The latest information on affordability published by ONS in 2024 ratio between median housing price to median annual income in 2023 of 17.61. This is significantly higher than the 13.92 seen ten years earlier in 2013. During that period median house prices almost doubled from £395,000 to 650,000.

The need for more housing in St Albans is clearly acute and that without amendments to the Green Belt boundary these needs will not be met. The intensity of the housing need in St Albans is sufficient to justify amendments not only to sites in more weakly performing areas of the green belt but also where green belt was considered to be meeting the green belt purposes more strongly, especially given the wider social and economic benefits that will arise from these developments. In particular the delivery of sites in the Green Belt will secure substantial increases in affordable housing. The 2023 AMR notes at paragraph 3.25 that between 1995/96 and 2022/23 that only 18% of net completions

was affordable housing – an average of 72 affordable homes each year. As we set out in our presentations this has increased to 84 dpa in the last five years but this is well below the 802 affordable homes the council consider are required to meet needs each year.

However, HBF is of the opinion that the Council could deliver more homes than the minimum required by national policy. Not only would further allocations provide much needed flexibility in supply earlier in the plan period but also ensure that more affordable homes were delivered – an important issue given the lack of supply in recent years. As the inspector will no doubt be aware, the issue of releasing green belt land to deliver a supply of homes in excess of housing needs was considered in *Compton vs Guildford* ([2019] EWHC 3242 (Admin)). In the decision it was noted in paragraph 91 that once meeting needs is considered to be a contributing factor to exceptional circumstances it follows that supply over and above those needs to ensure delivery would also contribute to those circumstances. Therefore, should the inspector decide it is necessary to increase supply to address the severe shortfall in housing in the first five years of the plan or to better address affordable housing needs, the case for exceptional circumstances would still be relevant to support further amendments to the Green Belt boundary for housing development.

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